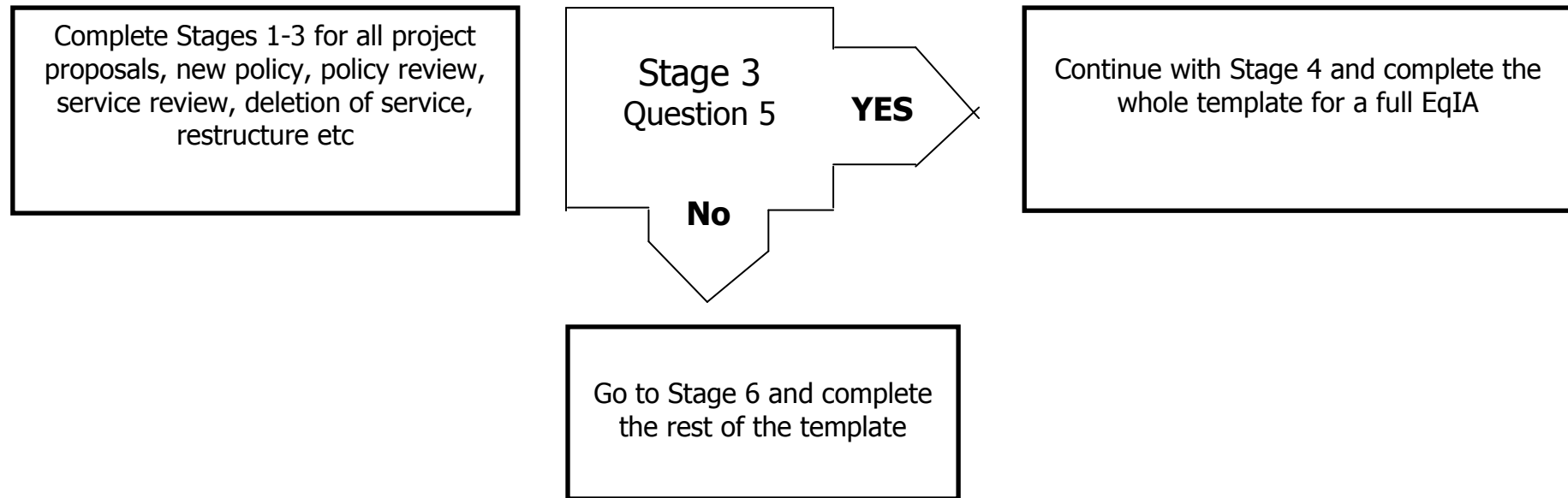


# Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process (EqIA). There is now just one Template. Lead Officers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- SIGN OFF: All EqIAs need to be signed off by your Directorate Equality Task Groups.
- Legal will NOT accept any report without a fully completed, Quality Assured and signed off EqIA.
- The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

## Equality Impact Assessment (EqIA) Template

<b>Type of Decision: Tick ✓</b>	✓	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	15 March 2018						
Value of savings to be made (if applicable):							
Title of Project:	Review of the Homelessness Strategy						
Directorate / Service responsible:	Community- Housing						
Name and job title of Lead Officer:	Jon Dalton Head of Housing Needs Housing Services Community Directorate <a href="mailto:Jon.Dalton@harrow.gov.uk">Jon.Dalton@harrow.gov.uk</a> Internal: 8647 External: 020 8416 8647						
Name & contact details of the other persons involved in the assessment:	Meghan Zinkewich-Peotti Housing Strategy Project Manager Housing Services Community Directorate <a href="mailto:Meghan.zinkewich-peotti@harrow.gov.uk">Meghan.zinkewich-peotti@harrow.gov.uk</a> Internal: 2346 External:						
Date of assessment (including review dates):	31 January 2018						
<b>Stage 1: Overview</b>							
1. What are you trying to do?  (Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)	We are refreshing this strategy for 2018/2019, in advance of a full review in mid-2019 once the new Homelessness Reduction Act 2017 has been implemented.  We must have a Homelessness Strategy by law and it must be reviewed every 5 years.  We will update the references to legislation and to welfare reform to reflect the changes that have taken place since the strategy was written.						

	We will add 3 new appendices to the strategy.					
2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	✓	Partners	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment	✓	Marriage and Civil Partnership	✓	Pregnancy and Maternity	✓
	Race	✓	Religion or Belief	✓	Sex	✓
	Sexual Orientation	✓	Other			
3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	Housing Services has the overall responsibility for Homelessness but works in partnership other council departments such as Children's, Adult Social Care, Housing Benefit and Residential Licensing and Enforcement.					

## Stage 2: Evidence & Data Analysis

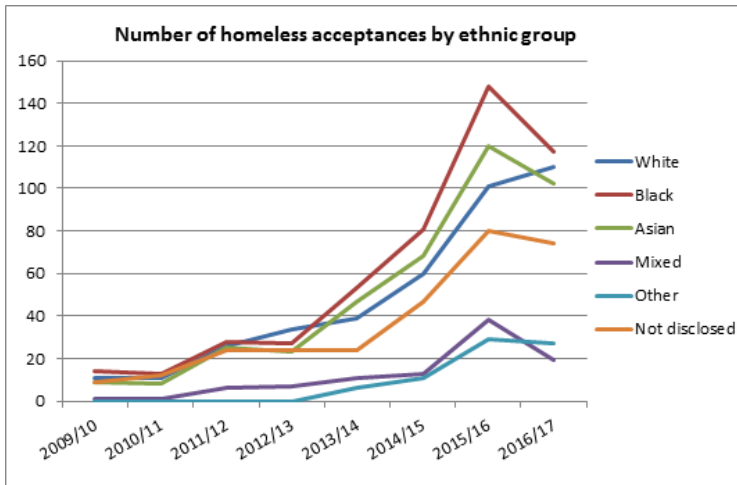
4. What evidence is available to assess the potential impact of your proposals? This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated for any Protected Characteristic), you should include this as an action to address in your Improvement Action Plan at Stage 6)

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. 48,060 (20.1%) were aged 0-15, 157,330 (65.8%) were aged 16-64 and 33,670 (14.1%) were aged 65+. 18% of Harrow's households are comprised solely of residents aged 65 and over.</p>	<p>People aged 30-39 years make up the biggest group of homeless applicants and of homeless acceptances.</p> <p>Women aged 30-39 years are the biggest group of homeless applicants, followed by women aged 20-29 years and women aged 40-49 years. These groups are also the biggest groups of homeless acceptances.</p>

	<p>In 2016/2017 there were 1385 homeless applicants.</p> <table border="1"> <tr><td>16/17 years</td><td>2</td><td>0.1%</td></tr> <tr><td>18/19 years</td><td>40</td><td>2.9%</td></tr> <tr><td>20-29 years</td><td>312</td><td>22.5%</td></tr> <tr><td>30-39 years</td><td>415</td><td>30%</td></tr> <tr><td>40-49 years</td><td>333</td><td>24%</td></tr> <tr><td>50-59 years</td><td>191</td><td>13.8%</td></tr> <tr><td>Over 60 years</td><td>92</td><td>6.6%</td></tr> </table> <p>There were 450 homeless acceptances.</p> <table border="1"> <tr><td>16/17 years</td><td>0</td><td>0%</td></tr> <tr><td>18/19 years</td><td>12</td><td>2.7%</td></tr> <tr><td>20-29 years</td><td>87</td><td>19%</td></tr> <tr><td>30-39 years</td><td>153</td><td>34%</td></tr> <tr><td>40-49 years</td><td>135</td><td>30%</td></tr> <tr><td>50-59 years</td><td>49</td><td>11%</td></tr> <tr><td>Over 60 years</td><td>14</td><td>3%</td></tr> </table>	16/17 years	2	0.1%	18/19 years	40	2.9%	20-29 years	312	22.5%	30-39 years	415	30%	40-49 years	333	24%	50-59 years	191	13.8%	Over 60 years	92	6.6%	16/17 years	0	0%	18/19 years	12	2.7%	20-29 years	87	19%	30-39 years	153	34%	40-49 years	135	30%	50-59 years	49	11%	Over 60 years	14	3%	<p>With regards to children, the Homelessness Strategy takes into account the Council's duties under the Children Act 2004.</p> <p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
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Disability (including carers of disabled people)	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. 34,850 (14.6%) of residents had a limiting long-term illness or disability which limited their day-to-day activities.</p> <p>Data is not currently available regarding disability and homeless applicants and acceptances.</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>																																										

Gender Reassignment	<p>Profile of Harrow residents:</p> <p>There is limited data held about this protected characteristic for the population and in relation to these groups and services. The England/Wales Census and Scottish Census have not asked if people identify as transgender. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000.</p> <p>Data is not currently available regarding gender reassignment and homeless applicants and acceptances.</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
Marriage / Civil Partnership	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. Harrow had a very high percentage of married couples. 53.7 per cent of residents (aged 16+) were in a marriage. The borough had lower levels of people with other marital and civil partnership status.</p> <p>Data is not currently available regarding marriage/civil partnership and homeless applicants and acceptances.</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
Pregnancy and Maternity	<p>Profile of Harrow residents:</p> <p>ONS births figures show Harrow as having 3,585 live births in 2012. There is limited data held about this protected characteristic for the population and in relation to these groups and services.</p> <p>Data is not currently available regarding pregnancy and</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>

	maternity and homeless applicants and acceptances.																																																																
Race	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. In 2011 44% of residents were Asian. Harrow's Indian group was the borough's largest minority ethnic group, with a population of 63,050 (26.4%). Other Asian groups accounted for 11.3% of Harrow's residents. Sri Lankans were the largest population group in this category in Harrow. 42.2% of residents were White, including 30.9% (73,830) White British. 8.2% of Harrow's residents were categorised in the Other White group, which comprised people from a large variety of backgrounds (mainly from other parts of Europe). 9.7% (23,105) of residents were Black, including Black African (3.6%) Black Caribbean (2.8%) and Other Black (1.8%). 4.1% of residents were included in the Arab and Other grouping.</p> <div><p>Number of homeless acceptances by ethnic group</p><table border="1"><thead><tr><th>Year</th><th>White</th><th>Black</th><th>Asian</th><th>Mixed</th><th>Other</th><th>Not disclosed</th></tr></thead><tbody><tr><td>2009/10</td><td>10</td><td>15</td><td>10</td><td>5</td><td>5</td><td>10</td></tr><tr><td>2010/11</td><td>10</td><td>15</td><td>10</td><td>5</td><td>5</td><td>10</td></tr><tr><td>2011/12</td><td>25</td><td>25</td><td>25</td><td>10</td><td>10</td><td>25</td></tr><tr><td>2012/13</td><td>30</td><td>30</td><td>30</td><td>10</td><td>10</td><td>25</td></tr><tr><td>2013/14</td><td>40</td><td>50</td><td>40</td><td>15</td><td>15</td><td>25</td></tr><tr><td>2014/15</td><td>60</td><td>80</td><td>60</td><td>20</td><td>20</td><td>45</td></tr><tr><td>2015/16</td><td>100</td><td>150</td><td>120</td><td>40</td><td>30</td><td>80</td></tr><tr><td>2016/17</td><td>110</td><td>120</td><td>100</td><td>20</td><td>30</td><td>75</td></tr></tbody></table></div>	Year	White	Black	Asian	Mixed	Other	Not disclosed	2009/10	10	15	10	5	5	10	2010/11	10	15	10	5	5	10	2011/12	25	25	25	10	10	25	2012/13	30	30	30	10	10	25	2013/14	40	50	40	15	15	25	2014/15	60	80	60	20	20	45	2015/16	100	150	120	40	30	80	2016/17	110	120	100	20	30	75	<p>Homelessness affects all communities regardless of ethnicity. However, it seems that a disproportionately large number of Black households are affected. 8.5% of Harrow's population are Black but they constituted 31% of homeless acceptances in 2016/17. This may highlight particular issues of housing need within this group.</p> <p>It is likely this group will positively benefit from the increased emphasis on homelessness prevention.</p> <p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
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Religion and Belief	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. Religious affiliation is very high in Harrow. In 2011 37.3% (89,168) of residents were Christians, 25.3% (60,410) were Hindus, 4.4% (10,530) were Jewish and 12.5% (29,880) were Muslims 2.5% (5,945) people were followers of Other Religions, including Sikhs, Buddhists, Jains and Zoroastrians 9.6% (22,870) of residents stated that they had no religion 6.2% didn't answer this question.</p> <p>Data is not currently available regarding religion and belief and homeless applicants and acceptances.</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
Sex / Gender	<p>Profile of Harrow residents at 2011:</p> <p>Harrow had a usual resident population of 239,056. 49.4 per cent of residents were males and 50.6 per cent were females.</p> <p>In 2016/2017 there were 1385 homeless applicants. 832 (60%) were female and 553 were male (40%).</p> <p>There were 450 homeless acceptances. 308 (68%) were female and 142 (32%) were male.</p>	<p>More women than men are homeless applicants and more women than men are accepted as homeless.</p> <p>Women aged 30-39 years are the biggest group of homeless applicants, followed by women aged 20-29 years and women aged 40-49 years. These groups are also the biggest groups of homeless acceptances.</p> <p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and therefore there will be no anticipated adverse influences under this protected characteristic.</p>
Sexual Orientation	<p>The ONS advises that in 2015, 1.7% of the UK population identified themselves as lesbian, gay or bisexual (LGB). In 2015, the population of London had the largest percentage who identified themselves as</p>	<p>We intend and anticipate that all applicants who are currently assisted to keep or obtain suitable accommodation by Housing Needs will continue to be assisted and others will now receive some assistance and</p>

	<p>lesbian, gay or bisexual (LGB) at 2.6%.</p> <p>Profile of Harrow residents:</p> <p>There is limited data held about this protected characteristic for the population and in relation to these groups and services.</p> <p>Data is not currently available regarding religion and belief and homeless applicants and acceptances.</p>	therefore there will be no anticipated adverse influences under this protected characteristic.
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### Stage 3: Assessing Potential Disproportionate Impact

5. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

**YES** - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, complete a FULL EqIA.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.
- **NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 6



## Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at **Stage 3**?

Who was consulted? What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? E.g. revising your proposals

## Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

Protected Characteristic	Positive Impact  ✓	Adverse Impact		Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7</b>	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc <b>(Also Include these in the Improvement Action Plan at Stage 6)</b>
		Minor ✓	Major ✓		
Age (including carers of young/older people)					
Disability (including carers of					

disabled people)					
Gender Reassignment					
Marriage and Civil Partnership					
Pregnancy and Maternity					
Race					
Religion or Belief					
Sex					
Sexual orientation					

<b>8. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?  If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	
<b>9. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?  If yes, what is the potential impact and how likely is it to happen?	Yes		No	

## Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity
- Monitoring the impact of the proposals/changes once they have been implemented
- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
All areas	Explore the reasons for unavailability of data and identify and implement actions to improve data collection, recording and analysis across all protected characteristics.	Data will be available and used to inform service changes.	Jon Dalton, Housing Needs and Mark Fosh, HIMT	November 2019
Race	Further analysis required into data indicating that a disproportionately large number of	Data will be available and used to inform service changes.	Jon Dalton, Housing Needs and Jonathan	November 2019

	Black households are affected by homelessness. Review research from the Runnymede Trust.		Kilworth, BIU	
Sex/Gender	Further analysis required into data indicating that women are more likely than men to apply as homeless.	Data will be available and used to inform service changes.	Jon Dalton, Housing Needs and Jonathan Kilworth, BIU	November 2019

### Stage 7: Public Sector Equality Duty

<p><b>10.</b> How do your proposals meet the Public Sector Equality Duty (PSED) to:</p> <ol style="list-style-type: none"> <li>1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</li> <li>2. Advance equality of opportunity between people from different groups</li> <li>3. Foster good relations between people from different groups</li> </ol>	The proposed changes to the strategy are intended to make the strategy more relevant, compliant and clearer to all stakeholders.
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### Stage 8: Recommendation

<b>11.</b> Which of the following statements best describes the outcome of your EqlA ( ✓ tick one box only)	
<b>Outcome 1</b> – No change required: the EqlA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed.	X
<b>Outcome 2</b> – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqlA and these are included in the Action Plan to be addressed.	
<b>Outcome 3</b> – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. In this case, the justification needs to be included in the EqlA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. <b>(Explain this in Q12 below)</b>	
<b>12.</b> If your EqlA is assessed as <b>outcome 3</b> explain your justification with full reasoning to continue with your proposals.	

### Stage 9 - Organisational sign Off

<b>13.</b> Which group or committee considered, reviewed and agreed the EqlA and the Improvement Action Plan?	Community DETG		
Signed: (Lead officer completing EqlA)	Jon Dalton	Signed: (Chair of DETG)	Dave Corby
Date:	5 March 2018	Date:	5 March 2018
Date EqlA presented at Cabinet Briefing (if required)		Signature of DETG Chair (following Cabinet Briefing if relevant)	